

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2019-326-E

IN RE: South Carolina Energy Freedom Act)
 (House Bill 3659) Proceeding to Address)
 S.C. Code Ann. Section 58-27-460(A)(1))
 and S.C. Code Ann.)
 Section 58-27-460(A)(2))
 (Promulgation and Periodic Review of)
 Standards for Interconnection and Parallel)
 Operation of Generating Facilities to an)
 Electrical Utility's Distribution and)
 Transmission System))

PETITION
TO
INTERVENE

This Commission established Commission Docket 2019-326-E, on October 10, 2019, by way of Commission Directive Order 2019-728, dated October 9, 2019 and Commission Directive Order 2019-796, in this Docket, on November 15, 2019.

Petitioner herein is Ecoplexus Inc, ("Ecoplexus" or "Petitioner"). This Petition to Intervene is filed pursuant to R. 103-825, of this Commission's Rules and Regulations and other applicable Rules and Regulations of this Commission, and Petitioner seeks permission to intervene and be made a party of record in the above-referenced Docket, with full rights of participation.

1. Ecoplexus is a Delaware Corporation, domesticated by the South Carolina Secretary of State's Office to conduct business in South Carolina. Ecoplexus maintains an office at 600 Park Office Dr., Suite 285, Durham, North Carolina 27709 in addition to locations in San Francisco and Dallas.

2. Ecoplexus is a leader in the development, design, engineering, construction, financing, operations and ownership of renewable energy systems for the commercial, government and utility markets. Ecoplexus develops, builds, owns and operates clean energy projects and has completed, or has in construction, over 400 megawatts of utility-scale renewable generation facilities in North America.

3. Therefore, Ecoplexus is financially impacted by the important decisions to be made by this Commission in this Docket, consistent with S.C. Code § 58-27-460(A)(1), (A)(2).

4. Therefore, Ecoplexus is financially impacted by the important decisions to be made by this Commission in this Docket, consistent with Section 58-27-460(A)(1), (A)(2), of the South Carolina Energy Freedom Act.

5. Specifically, Ecoplexus conducts business throughout South Carolina and has a material interest in the outcome of this Docket.

6. This Commission's compliance with Section 58-27-460(A)(1), (A)(2) will directly impact the operations of Ecoplexus because of Ecoplexus' substantial business interests throughout South Carolina.

7. Petitioner's position is that Ecoplexus has a direct and substantial interest in this Docket and Petitioner's interests cannot be adequately addressed by any other party. Petitioner's further position is that Ecoplexus will be directly impacted. Therefore, the decisions of this Commission are important to the Petitioner from a financial and business standpoint. Petitioner's Intervention will aid this Commission, by assisting in the development of a full and fair record to address the important decisions to be made in this Docket.

8. Petitioner should be allowed to intervene in this Docket, with full rights of cross-examination, discovery and participation in any Hearing to be scheduled in this Docket.

9. The granting of Ecoplexus' Petition to Intervene is (i) in the public interest and (ii) consistent with the policies of this Commission in encouraging maximum public participation in issues before it and intervention should be allowed so that a full and complete record addressing its views and concerns can be developed.

10. This Petition to Intervene is timely filed with this Commission.

11. Petitioner has previously received approval for intervention from this Commission, including Commission Docket 2018-202-E, Docket 2019-176-E, Docket 2019-184-E, Docket 2019-185-E, Docket 2019-186-E, Docket 2019-195-E, Docket 2019-196-E and Docket 2019-197-E and currently has intervention pending in Docket 2020-2-E.

12. Ecoplexus is represented by counsel in this proceeding:

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WHEREFORE, Petitioner prays for the following relief:

- (a) That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- (b) That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- (c) For such other and further relief as this Commission may deem just and proper.

Respectfully Submitted,
/s/Richard L. Whitt
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Counsel for Petitioner, Ecoplexus Inc

December 17, 2019